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	S DISTRICT COURT ICT OF CALIFORNIA
ANIDAL DODDICHEZ CAL CATALDO	C N 2-20 04600 DC
JULIAN SANTIAGO, and SUSAN LYNN	Case No.: 3:20-cv-04688-RS
HARVEY individually and on behalf of all	DECLARATION OF MARK MAO IN OPPOSITION TO GOOGLE'S MOTION
other similarly situated,	TO EXCLUDE OPINION OF MICHAEL
Plaintiffs,	J. LASINSKI
V.	Judge: Hon. Richard Seeborg
GOOGLE LLC,	Courtroom 3 – 17th Floor Date: October 5, 2023
Defendant.	Time: 1:30 p.m.
	Tel.: (914) 749-8200 dboies@bsfllp.com  Mark C. Mao, CA Bar No. 236165 Beko Reblitz-Richardson, CA Bar No. 238027  44 Montgomery St., 41st Floor San Francisco, CA 94104 Tel.: (415) 293-6800 mmao@bsfllp.com brichardson@bsfllp.com  James Lee (admitted pro hac vice) Rossana Baeza (admitted pro hac vice) 100 SE 2nd St., 28th Floor Miami, FL 33131 Tel.: (305) 539-8400 jlee@bsfllp.com rbaeza@bsfllp.com Alison L. Anderson, CA Bar No. 275334 M. Logan Wright, CA Bar No. 349004 725 S Figueroa St., 31st Floor Los Angeles, CA 90017 Tel.: (213) 995-5720 alanderson@bsfllp.com mwright@bsfllp.com  UNITED STATES NORTHERN DISTR  ANIBAL RODRIGUEZ, SAL CATALDO, JULIAN SANTIAGO, and SUSAN LYNN HARVEY individually and on behalf of all other similarly situated,  Plaintiffs, V. GOOGLE LLC,

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#### **DECLARATION OF MARK MAO**

- I, Mark Mao, declare as follows.
- 1. I am a partner with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of California. I have personal knowledge of the matters set forth herein and am competent to testify.
- 2. I submit this Declaration in connection with Plaintiffs' opposition to Google's motion to exclude the opinions and testimony of Michael J. Lasinski.
- 3. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the deposition transcript of Michael J. Lasinski, taken June 29, 2023.
- 4. Attached hereto as Exhibit 2 is a true and correct copy of a Google webpage published on June 23, 2020, titled "How our display buying platforms share revenue with available publishers." This webpage is publicly https://blog.google/products/admanager/display-buying-share-revenue-publishers/.
- 5. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from Google's Rebuttal Expert Report of Christopher R. Knittel, dated May 31, 2023.
- 6. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the deposition transcript of John R. Black, taken July 14, 2023.
- 7. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the deposition transcript of Christopher R. Knittel, taken July 11, 2023.
- 8. Attached hereto as Exhibit 6 is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00052784.
- 9. Attached hereto as Exhibit 7 is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00188469.
- 10. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from the deposition transcript of Jonathan R. Hochman, taken June 26, 2023.
- 11. Attached hereto as Exhibit 9 is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00028472.

- 12. Attached hereto as **Exhibit 10** is a true and correct copy of International Valuation Standards published by the International Valuation Standards Council, effective January 31, 2022.
- 13. Attached hereto as **Exhibit 11** is a true and correct copy of *Exploring the Economics of Personal Data: A Survey of Methodologies for Measuring Monetary Value*, published by the Organization for Economic Co-operation and Development on April 2, 2013. This document is also publicly available at https://www.oecd-ilibrary.org/science-and-technology/exploring-the-economics-of-personal-data\_5k486qtxldmq-en.
- 14. Attached hereto as **Exhibit 12** is a true and correct copy of excerpts from the deposition transcript of Donna R. Hoffman, taken July 11, 2023.
- 15. Attached hereto as **Exhibit 13** is a true and correct copy of a letter sent by Eduardo Santacana, counsel for Google, to Beko Reblitz-Richardson, counsel for Plaintiffs, on December 31, 2020.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 7th day of September 2023, at San Francisco, California.

#### /s/ Mark Mao